

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	No. 4:15CR00394 RLW (TCM)
)	
ZONDRA E. JONES, and)	
RICKER D. BROOKS,)	
)	
Defendants.)	

DISCLOSURE OF ARGUABLY SUPPRESSIBLE EVIDENCE
AS TO DEFENDANT ZONDRA E. JONES

COMES NOW, the United States of America, by and through Richard G. Callahan, United States Attorney for the Eastern District of Missouri, and, Steven A. Muchnick, Assistant United States Attorney for said District, and for the Disclosure of Arguably Suppressible Evidence as to Defendant Zondra E. Jones, states as follows:

Pursuant to the District Court's Order Concerning Pretrial Motions, the government is hereby informing defendant Zondra E. Jones of its intention to use the following arguably suppressible evidence at trial:

1. Oral statements made by defendant Zondra E. Jones to a Special Agent and a Revenue Agent of the Internal Revenue Service on August 30, 2012.
2. Oral statements made by defendant Zondra E. Jones to two Special Agents of the Internal Revenue Service on March 15, 2013.
3. Oral statements made by defendant Zondra E. Jones to two Special Agents of the Internal Revenue Service on April 10, 2013.

Respectfully submitted,

RICHARD G. CALLAHAN
United States Attorney

s/Steven A. Muchnick

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CERTIFICATE OF SERVICE

I hereby certify that on September 17, 2015, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the following:

Kenneth R. Schwartz

Mark A. Hammer

s/ Steven A. Muchnick

STEVEN A. MUCHNICK #27597MO

Assistant United States Attorney